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IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA, *et al.*, *Petitioners*,

v.

STATE OF TEXAS, *et al.*, *Respondents*.

On Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

BRIEF OF AMERICAN IMMIGRATION COUNCIL, NATIONAL IMMIGRATION LAW CENTER, SERVICE EMPLOYEES INTERNATIONAL UNION, AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS, ADVANCEMENT PROJECT, LATINOJUSTICE PRLDEF, THE LEADERSHIP CONFERENCE ON CIVIL AND HUMAN RIGHTS, AND OTHERS AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS

JONATHAN WEISSGLASS
Counsel of Record
ERIC P. BROWN
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151
jweissglass@altshulerberzon.com

Attorneys for Amici Curiae
Service Employees International Union and American Federation of Labor and Congress of Industrial Organizations
[Additional Counsel on Inside Cover]

Peake DeLancey Printers, LLC - (301) 341-4600 - Cheverly MD

ADDITIONAL COUNSEL FOR *AMICI CURIAE*

MELISSA CROW
EMILY CREIGHTON
American Immigration Council
1331 G Street, N.W., Suite 200
Washington, D.C. 20005
Tel: (202) 507-7523

MARIELENA HINCAPIÉ
LINTON JOAQUIN
KAREN C. TUMLIN
National Immigration Law Center
3435 Wilshire Blvd., Suite 2850
Los Angeles, CA 90010
Tel: (213) 639-3900

Attorneys for all Amici Curiae *except those listed separately below*

JUDITH A. SCOTT
DEBORAH L. SMITH
Service Employees International Union
1800 Massachusetts Ave., N.W.
Washington, D.C. 20036
Tel: (202) 730-7455

Attorneys for Amicus Curiae *Service Employees International Union*

PENDA D. HAIR
FLAVIA JIMENEZ
Advancement Project
1220 L Street, N.W., Suite 850
Washington, D.C. 20005
Tel: (202) 728-9557

Attorneys for Amicus Curiae *Advancement Project*

WADE J. HENDERSON
LISA M. BORNSTEIN
The Leadership Conference on Civil and Human Rights
1629 K Street, N.W.
Washington, DC 20006
Tel: (202) 466-3311

Attorneys for Amicus Curiae *The Leadership Conference on Civil and Human Rights*

LYNN K. RHINEHART
HAROLD C. BECKER
MATTHEW J. GINSBURG
American Federation of Labor and Congress of Industrial Organizations
815 Sixteenth Street, N.W.
Washington, D.C. 20006
Tel: (202) 637-5397

Attorneys for Amicus Curiae *American Federation of Labor and Congress of Industrial Organizations*

JUAN CARTAGENA
JOSE PEREZ
LatinoJustice PRLDEF
99 Hudson Street, 14th Floor
New York, NY 10013
Tel: (212) 219-3360

Attorneys for Amicus Curiae *LatinoJustice PRLDEF*

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INTEREST OF *AMICI CURIAE*

Amici curiae are the American Immigration Council, the National Immigration Law Center, the Service Employees International Union, the American Federation of Labor and Congress of Industrial Organizations, the Advancement Project, LatinoJustice PRLDEF, The Leadership Conference on Civil and Human Rights, and 217 other immigrants' rights, civil rights, labor, and service provider organizations.[1]

The American Immigration Council ("Immigration Council") is a nonprofit organization established to increase public understanding of immigration law and policy, advocate for the just and fair administration of the immigration laws, protect the legal rights of noncitizens, and educate the public about the enduring contributions of America's immigrants. The Immigration Council engages in impact litigation, appears as *amicus curiae* before federal courts and administrative tribunals, provides technical assistance to immigration lawyers across the country, and has played a key role in implementing the Deferred Action for Childhood Arrivals ("DACA") program.

The National Immigration Law Center ("NILC") is the primary national organization in the United States exclusively dedicated to defending and advancing the rights and opportunities of low-income

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[1] Pursuant to Rule 37.6, *amici* certify that no counsel for a party authored this brief in whole or in part, and no person other than *amici* or their counsel made a monetary contribution to the preparation or submission of this brief. Pursuant to Rule 37.2(a), this *amicus* brief is filed more than 10 days before its due date, and all parties consented to the filing of this brief.

immigrants and their families. Over the past 35 years, NILC has won landmark legal decisions protecting fundamental rights, and advanced policies that reinforce the values of equality, opportunity, and justice. NILC has worked extensively on implementation of the DACA program, and works closely with organizations led by DACA recipients.

The Service Employees International Union ("SEIU") is an international labor organization representing approximately two million working men and women in the United States and Canada employed in the private and public sectors. Many of SEIU's members are foreign-born U.S. citizens, lawful permanent residents, or immigrants authorized to work in the United States. Many of SEIU's members have mixed-status families.

The American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO") is a federation of 56 national and international labor organizations with a total membership of approximately 12.5 million working men and women. Unions affiliated with the AFL-CIO represent immigrant workers – including undocumented workers as well as employment-authorized workers with undocumented family members – in workplaces throughout the country, including in industries such as meatpacking, leisure and hospitality, construction, domestic services, and agriculture.

The Advancement Project ("AP") is a next generation, multi-racial civil rights organization. Rooted in human rights struggles for equality and justice, AP exists to fulfill America's promise of a caring, inclusive, and just democracy. AP uses innovative tools and strategies to strengthen social movements

and achieve high impact policy change. AP combines law, communications, policy, and technology to create workable solutions and achieve systemic change on issues of democracy, voting rights, and access to justice. Its immigrant justice project works with grassroots organizations that serve and advocate on behalf of immigrants, including undocumented immigrants, many of whom would be eligible for DACA and the Deferred Action for Parents of Americans and Lawful Permanent Residents ("DAPA") program. Many of these immigrants have lived and worked in their communities for a number of years and fear separation from their families as a result of enforcement actions by local, state, and federal law enforcement.

LatinoJustice PRLDEF is a national nonprofit pan-Latino law organization that has engaged in impact litigation, advocacy, and education to defend the civil and constitutional rights of Latinos since 1972. LatinoJustice champions an equitable society through advancing Latino civil engagement, cultivating leadership, and protecting civil rights and equality in the areas of voting rights, immigrant rights, and fair access to housing, education, and employment. LatinoJustice strongly supports the federal government's lawful executive actions on immigration that provided relief from deportations for thousands of Latina/o students and DREAMers and the more recent expansion of DACA eligibility and DAPA that would provide further protection for Latina/o families across the country.

The Leadership Conference on Civil and Human Rights ("The Leadership Conference") is a diverse

coalition of more than 200 national organizations charged with promoting and protecting the civil and human rights of all persons in the United States. It is the nation's oldest, largest, and most diverse civil and human rights coalition. The Leadership Conference was founded in 1950 by three legendary leaders of the civil rights movement – A. Philip Randolph of the Brotherhood of Sleeping Car Porters; Roy Wilkins of the NAACP; and Arnold Aronson of the National Jewish Community Relations Advisory Council. For more than half a century, The Leadership Conference, based in Washington, D.C., has led the fight for civil and human rights by advocating for federal legislation and policy, securing passage of every major civil rights statute since the Civil Rights Act of 1957. The Leadership Conference works to build an America that is inclusive and as good as its ideals. Its member organizations represent people of all races, ethnicities, and sexual orientations.

An appendix to this brief lists the 224 *amici* organizations. These organizations seek to further immigrants' rights, civil rights, labor rights, and other social interests. *Amici* have a substantial interest in this case, which implicates issues that are a central focus of their advocacy, directly impacts the communities they serve, and concerns programs many of them have worked to implement.

SUMMARY OF ARGUMENT

The court below upheld a preliminary injunction that is preventing millions of people with close ties to the United States from applying for a temporary, revocable reprieve from deportation and for work

authorization. The sweeping injunction directly harms individuals who have either been in the U.S. since they were children or are the parents of U.S. citizens or lawful permanent residents. By extension, the injunction also harms the families and communities of the millions of individual immigrants who can meet the application requirements.

If the injunction is lifted, many deserving individuals will have access to better jobs and the ability to improve their lives, the lives of their families, and their communities. Family units will also be more secure, without the looming threat that loved ones will be deported. The people whose tribulations, struggles, and contributions to the United States are profiled here, and who represent countless others, illustrate the importance of this case to millions of individuals, their families, their communities, and the nation as a whole.

ARGUMENT

I. The Enjoined Programs Would Benefit Millions Of People And Their Families And Communities

The decision below upholds a preliminary injunction blocking a Department of Homeland Security ("DHS") initiative that would both expand the 2012 Deferred Action for Childhood Arrivals ("DACA") program and implement a new program known as Deferred Action for Parents of Americans and Lawful Permanent Residents ("DAPA"). These two programs are of critical importance to large numbers of people, making this a case of nationwide significance.

DACA allows people who have been in the United States since they were children and who meet the program's criteria to apply for temporary deferral of deportation (sometimes referred to as "deferred action") and for work authorization. Pet. App. 415a-416a. According to U.S. Citizenship and Immigration Services ("USCIS"), more than 680,000 people have been granted deferred action under DACA in the approximately three years the program has existed. USCIS, Number of I-821D, Consideration of Deferred Action for Childhood Arrivals by Fiscal Year, Quarter, Intake, Biometrics and Case Status: 2012-2015 (June 30), *available at* http://1.usa.gov/1JDsx1z. By expanding the program, DHS would allow greater numbers of young immigrants who were brought to the U.S. as children and have made their lives here the opportunity to continue to reside here and thrive. *See* Migration Policy Institute, Profile of the Unauthorized Population: United States, *available at* http://bit.ly/1FLd5kL (estimating increase of more than 250,000 people eligible for DACA under expansion).

Like DACA, the new program, DAPA, would create much-needed stability in immigrant families. DAPA would allow the parents of U.S. citizens and lawful permanent residents to apply for temporary deferral of deportation and for work authorization if they meet the program's requirements. Pet. App. 416a-417a. Although exact estimates vary, all sources indicate that millions of people would be eligible for this new program. *See, e.g.*, Migration Policy Institute, Profile of the Unauthorized Population: United States (estimating approximately 3.6 million people eligible for DAPA); Pet. App. 5a-6a (Court of

Appeals' opinion estimating 4.3 million people eligible for DAPA).

Together, DAPA and expanded DACA promise to benefit millions of individual immigrants who have close ties to this country. In addition, the programs stand to benefit millions of U.S. citizen children, family members, employers, employees, and community members who have established relationships with these individuals.

Under DAPA and expanded DACA, many currently employed undocumented individuals would have access to better jobs and improved working conditions. Because undocumented immigrants seek jobs that minimize their risk of being identified and deported, they often do not work in jobs that best fit their education, skills, and abilities, or those which would maximize their earning potential. Patrick Oakford, *Administrative Action on Immigration Reform, The Fiscal Benefits of Temporary Work Permits*, at 6 (Center for American Progress, 2014), *available at* http://ampr.gs/1vw27HZ. Making workers eligible for deferred action and work permits would allow them greater occupational mobility, enabling them to seek out a wider range of potential jobs. Moreover, "[t]he interaction between our broken immigration system and employment and labor laws have made undocumented workers more susceptible to exploitation in the workplace, leading them to earn lower wages than they otherwise could." *Id.* at 5. Eliminating the fear of retaliatory reporting of immigration violations and potential deportation would allow these workers to better protect their own workplace rights and those of their co-workers, leading to higher real wag-

es and fewer violations of employment and labor laws and regulations.[2]

Those eligible for deferred action will enjoy increased earning potential (producing a positive multiplier effect on local economies). Fiscal Policy Institute, *President's Immigration Action Expected to Benefit Economy*, *available at* http://bit.ly/1FbnS7q (estimating that wages for those eligible for work authorization will increase by five to 10 percent); Oakford, *Administrative Action on Immigration Reform, The Fiscal Benefits of Temporary Work Permits*, at 3 ("Temporary work permits would increase the earnings of undocumented immigrants by about 8.5 percent as they are able to work legally and find jobs that match their skills."). Overall, one estimate suggests that the group of individuals eligible to receive deferred action through expanded DACA and DAPA "will experience a labor income increase of $7.1 billion dollars." Dr. Raul Hinojosa-Ojeda with Maksim Wynn, *From the Shadows to the Mainstream: Estimating the Economic Impact of Presi-*

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[2] The deferred action programs will not have a negative impact on employment for native-born workers. "Theory suggests that these policy changes would not have an effect on the long-run employment (or unemployment) rate . . . as the additional demand associated with the expanded economy would offset the additional supply of workers. . . . Consistent with the theory, much of the academic literature suggests that changes in immigration policy have no effect on the likelihood of employment for native workers." White House Council of Economic Advisors, *The Economic Effects of Administrative Action on Immigration*, at 9 (Nov. 2014), *available at* http://1.usa.gov/1vwdrJQ (citing several academic studies conducted between 1990 and 2014).

dential Administrative Action and Comprehensive Immigration Reform, Appendix A at 32 (North American Integration and Development Center, Nov. 21, 2014), *available at* http://bit.ly/1QShl90.

The upward mobility that would result from DAPA and expanded DACA is apparent from the results of a national survey of 1,402 young adults who were approved for DACA through June 2013:

> Since receiving DACA, young adult immigrants have become more integrated into the nation's economic institutions. Approximately 61% of DACA recipients surveyed have obtained a new job since receiving DACA. Meanwhile, over half have opened their first bank account, and 38% have obtained their first credit card.

Roberto G. Gonzales and Veronica Terriquez, *How DACA is Impacting the Lives of Those who are now DACAmented: Preliminary Findings from the National UnDACAmented Research Project* (American Immigration Council, 2013), *available at* http://bit.ly/1jaS0tq. In short, DACA created significant economic benefits for qualifying individuals and for the nation at large by permitting greater levels of contribution to the workforce by educated individuals who previously had limited employment opportunities. DAPA and expanded DACA would do the same.

Beyond these economic benefits, there is a less tangible but also important benefit in the security that family unity provides. *See generally* Human Impact Partners, *Family Unity, Family Health: How Family-Focused Immigration Reform Will Mean Better Health for Children and Families* (June 2013), *available at* http://bit.ly/1eU6dmk (discussing conse-

quences of immigration detention and deportation policy on individuals' physical and mental health and children's educational and behavioral outcomes as documented by numerous academic studies); Ajay Chaudry, *et al.*, *Facing Our Future: Children in the Aftermath of Immigration Enforcement* (The Urban Institute, 2010), *available at* http://urbn.is/217ObaG (studying consequences of parental arrest, detention, and deportation on children). DAPA and expanded DACA would allow families to stay together, and alleviate the anxiety that families feel about the possibility of being separated.

II. The Human Impact Of The Enjoined Programs

The stories of the individuals described below highlight the benefits of permitting DHS to implement DAPA and expand DACA unimpeded by judicial intervention. The following are descriptions of individuals who, with their families and communities, stand to benefit from deferred action and who have long made the United States their home and contributed in a multitude of ways.[3]

A. Individuals Who Immigrated As Children

A significant number of individuals meet the educational and other requirements under the initial DACA program, but are ineligible under that initiative because they do not satisfy the age and arrival date requirements. Expanded DACA would allow certain

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[3] Information for all descriptions is on file with Karen Tumlin at NILC.

individuals who came to the United States as children to apply for temporary protection from deportation and for work authorization regardless of their age on the date of the 2012 DACA announcement, so long as they were already living in the United States on January 1, 2010. The preliminary injunction blocking expanded DACA bars these individuals from seeking this important relief, even as they contribute significantly to our society. The following are some of the many people who would be eligible for DACA but for the preliminary injunction in this case.

Jose Antonio Vargas. Jose Antonio Vargas, who is now 34, arrived in the United States at age 12 from Antipolo, Philippines. He currently lives in Los Angeles, California. Jose is a Pulitzer Prize winning journalist who was part of the *Washington Post* team covering the Virginia Tech shootings in 2011. He is also a filmmaker and founder of the nonprofit media and culture campaign, "Define American," which seeks to elevate the immigration conversation in the United States. Jose discovered he was undocumented at age 16 when he attempted to apply for a driver's license. He is the only undocumented person among his more than 30 family members living in the United States, including his U.S. citizen grandmother whom he supports.

Jose missed the age cut-off for the original DACA program by a few months, but would qualify for expanded DACA. Jose is an American entrepreneur and business owner who has made tremendous contributions to society through his films and advocacy work. He has created at least 23 jobs for U.S. citizens despite lacking his own work authorization. He soon

will be launching a new for-profit news website, #EmergingUS, which has already resulted in eight additional job opportunities.

Cris. Cris was born in the Philippines and arrived in the United States at the age of six, but missed the original cut-off for DACA by one year. Cris is the founder of an award-winning start-up company, Grant-Answers, based on his previous success in helping low-income and first-generation students earn more than one million dollars in grants and scholarships for college. He is also developing a career readiness mobile application called KeyJargon. He holds a Bachelor's degree in Psychology and a Master's degree in Criminal Justice from the City University of New York, and has nearly completed his PhD.

Despite his professional successes, Cris remains undocumented. The implementation of expanded DACA would alleviate his and his family's concerns that he may be deported. Through expanded DACA, Cris would be able to continue his doctoral studies, the funding for which was revoked due to his immigration status, and pursue additional career opportunities in public service helping youth and marginalized groups.

Juan Carlos. Juan Carlos is 22 years old and lives in Maryland. He was born in El Salvador and came to the United States when he was 15 years old. He was detained while crossing into the United States in 2008, missing the June 15, 2007 cut-off date for entry into the United States under the original DACA program, and has a final order of removal. Following his high school graduation in June 2012, Juan Carlos was offered admission to five colleges. He reluctantly

turned down these opportunities because, as an undocumented student, he did not qualify for in-state tuition and could not afford to pay the out-of-state tuition at the colleges where he was accepted.

Juan Carlos lives in constant fear of deportation. As a gay man, his deportation to El Salvador could result in severe persecution or even death given El Salvador's history of anti-gay hate crimes and discrimination. In addition to alleviating this fear of deportation, deferred action would also allow Juan Carlos to pursue his dreams of attending college and eventually becoming an architect.

Aly. Aly has lived in the United States for 30 years. He arrived in 1985 from Dakar, Senegal, at age eight. He currently lives in Syracuse, New York, where he is a community organizer. Aly came to the United States as the son of a diplomat working at the United Nations. He eventually traded his diplomatic visa for a student visa, graduated from Georgetown Preparatory School, attended the University of Pennsylvania, and completed his studies with a Bachelor of Arts in Political Science from Le Moyne College in Syracuse. He missed the age cutoff for the original DACA program, but would be able to apply under the expansion.

Bo. Boonyarit ("Bo") is 19 years old and lives in Irvine, California. He is a second-year student majoring in International Studies at the University of California, Irvine. Bo came to the United States from Thailand in 2009 when he was 13 years old. DACA did not provide him relief, because he entered the United States in 2009 and missed DACA's entry date requirement by two years. Expanded DACA would allow him to pursue work and other opportunities.

Bo is an active leader in his community. He has participated in various community groups that advocate for education, immigration, and civic engagement, and recently joined an organization that provides assistance to the homeless. Bo calls the United States his home, and cannot see himself returning to Thailand. The United States is where his family, friends, and mentors live. Bo's current dreams have limits due to his status, but he hopes for relief that will allow him to contribute to society in a way that reflects his full potential.

Alejandro. Alejandro is 21 years old and lives in Los Angeles, California. He was born in Mexico, but came to the United States in 2008 when he was 13 years old. Alejandro is currently an honor roll student at Los Angeles Community College, and he is the first person in his family to attend college. Alejandro is an active member of his academic community and has held numerous positions in student government, including his current position as a Senator-at-Large. Additionally, he volunteers with his school's Puente Program, mentoring other students and coordinating campus events focused on enabling students to transfer to four-year institutions. Alejandro himself will transfer to a four-year college next fall.

Despite these accomplishments, Alejandro faces numerous impediments to his academic and professional success due to his lack of work authorization. For example, although he has been offered a number of jobs at school as a result of his civic engagement, he has had to decline them. Obtaining work authorization would not only permit him to continue his education, but also to develop his resume to allow

him to succeed when he enters the work force. Alejandro fears that absent the ability to work legally in this country, his academic and career choices will be severely curtailed.

B. Parents Of U.S. Citizens And Lawful Permanent Residents

DACA was aimed at young immigrants with strong ties to the United States. DAPA would provide similar relief for undocumented parents of U.S. citizens and lawful permanent residents. Like DACA recipients, individuals eligible for DAPA necessarily have long-standing ties to the community. Their continued presence in the United States and ability to earn a living is crucial to the development and success of their U.S. citizen and permanent resident children. Given the millions of people who would be eligible for DAPA, there would also be millions of children who would benefit from the program. DAPA recognizes that the task of raising a child is made ever more difficult when uncertainty looms – whether related to deportation or financial security. The following are some people who would be eligible for DAPA if the preliminary injunction is lifted.

Maria. Maria is a 46-year-old citizen of Mexico who has lived in the United States for 26 years and currently resides in Durham, North Carolina. She is the single mother of two U.S. citizen children, a 19-year-old son and a 16-year-old daughter. To support her family, Maria works three jobs: washing dishes and cooking in a restaurant, cleaning houses, and cleaning a school that her son attended on a scholarship through eighth grade. In Maria's words, the implementation of DAPA would be a "dream come true" and would en-

able her to follow her dream of continuing her studies and opening her own beauty shop. In addition to enabling their mother to realize her potential, DAPA would alleviate the fear Maria's children feel that their mother could be removed at any moment.

Baldo. Baldo came to the United States from Michoacán, Mexico, in 1988, when he was 17 years old. He lives in Pasadena, California, with his wife and their two U.S. citizen daughters, ages nine and 13. While in the United States, he trained as an electrician and, for nearly 20 years, worked for the same company installing electrical wiring and residential security systems. He lost his job in March 2014 when his employer discovered that Baldo was undocumented. Baldo's employer told Baldo that he hated to lose him and that he would like to rehire him as soon as Baldo obtained work authorization. Baldo's current work as an independent contractor has created financial difficulties for him and his family, as he can no longer rely on a weekly paycheck and cannot count on getting work every week. The lack of a reliable income makes it difficult for Baldo to plan for his family's financial future.

Baldo's financial difficulties are compounded by his fear of being forced to return to Michoacán, where he has not lived in nearly 30 years. He has heard from family members about kidnappings and other drug cartel-related violence, and would not feel safe returning to Michoacán. Given the risk of harm, he would not want to take his daughters there, but he also would not want to be separated from them.

As the father of two U.S. citizen children, Baldo would benefit from DAPA, which would enable him to return to his former employer and regain the fi-

nancial stability his family lost when he was terminated from his long-term job. Deferred action would also relieve Baldo of his fear of deportation and allow his family to remain together.

Denis and Reina. Denis has lived in the U.S. for 12 years. His wife, Reina, has lived in the U.S. since 2007. Both are from Honduras and have a two-year-old son who is a U.S. citizen. Denis left Honduras in 2003 because he feared for his life. Denis has lived in the New Orleans area since Hurricane Katrina. A skilled roofer and construction worker, he came to the city to help rebuild New Orleans.

Unfortunately, Denis and Reina's son has been diagnosed with respiratory complications that require regular physician visits as well as emergency care. Denis' income is the family's main source of financial support, and multiple physicians have advised him that his continued presence in the United States is critical to ensuring that his son receives adequate medical care. Denis is subject to a final removal order, which was issued following proceedings that he did not adequately understand and at which he appeared *pro se*. Denis lives in constant fear of deportation. DAPA would protect Denis and Reina from deportation, allowing their family to remain together and maximizing the chances for a healthy future for their son.

Mercedes. Mercedes lives in Boulder, Colorado, and is a single mother caring for three U.S. citizen daughters. Mercedes has not seen her husband since late 2011, when he was deported as a result of a warrant for failure to appear in court for a traffic citation. Her husband had previously been the sole pro-

vider for the family, and Mercedes, now age 49, has taken on all the various roles that the two of them used to share in raising their daughters, who are ages 17, 15, and 10. To make ends meet, Mercedes works two jobs, as a private childcare provider and a caregiver for the elderly.

Her husband's deportation created emotional and practical challenges for Mercedes and her family. As a result of his absence, her middle child has been suffering from depression, refusing to leave the house other than to go to school. Mercedes' own health has also deteriorated. She was recently diagnosed as pre-diabetic and anemic in addition to having osteoporosis and a heart murmur, for which she avoids getting echocardiograms due to the high cost and her lack of health insurance.

The possibility of being deported to Mexico is Mercedes' chief concern when she thinks about the future of her daughters. Not only would her two younger daughters no longer have a mother to raise them, but her oldest daughter, who is nearly 18, would have to defer her own dreams of going to college and becoming a forensic anthropologist to take care of her sisters. The implementation of DAPA would mean Mercedes would no longer risk separation from her children and would have enhanced opportunities to provide for her family and contribute to her community.

Nga. Nga came to the United States from Vietnam on a V-nonimmigrant visa in 2004 to reunite with her husband, a lawful permanent resident. She started working in Houston, Texas, and became an integral part of her community. But her marriage ended in divorce before her immigrant visa process was finalized.

She moved in with her uncle until 2007, when he sexually abused her. She moved out, sought legal assistance, and reported his conduct to the police, but her uncle was never prosecuted. Nga was placed in a women's shelter as she had nowhere else to go. Later, she moved in with her partner, who was a lawful permanent resident. In 2009, when her partner found out that Nga was pregnant with his child, he broke up with her. Nga was, once again, left to fend for herself. In June 2010, Nga gave birth to a baby girl, a U.S. citizen, and began raising her as a single mother.

Around the same time, Nga's work permit expired. She was left without a way to earn a steady income, and became embroiled in a custody battle with her ex-partner over her child. Based in part on Nga's lack of stable employment, the father of the child was awarded custody. Nga currently sees her daughter weekly, while working low-paying jobs in the restaurant industry. DAPA would help Nga seek better and more stable employment opportunities, and regain custody of her daughter.

Mayela. Mayela is a 53-year-old mother of two U.S. citizens, ages 15 and 16. She emigrated to the United States from Mexico more than 20 years ago, and lives in San Jose, California. She and her husband are both undocumented. Mayela cleans homes, babysits children, and cares for senior citizens. Her husband works four low-paying jobs. Mayela's diabetes requires her to pay for monthly clinic visits, laboratory fees, and medications because she is ineligible for medical coverage.

DAPA would offer Mayela a sense of security as she would no longer live in fear of deportation.

DAPA would also enable her to apply for a work permit and to seek higher-paying jobs to help her sons, who plan to attend college. Mayela wants one day to feel accepted and included in the country that she considers her home.

Antonio and Ramona. Antonio and Ramona came to the United States from Mexico in 1995. They currently reside in Sacramento, California. Antonio, age 50, and Ramona, age 52, have three children. Their two younger daughters are U.S. citizens, and their oldest daughter is a DACA recipient. Antonio and Ramona began cleaning buildings when they arrived in the United States, and are now the proud owners of a cleaning business that they have operated for more than 15 years. Through their business, they have employed various individuals in the past.

Antonio and Ramona would like to finally feel secure. They were unable to bring one of their daughters to San Diego to attend college and cannot visit her there due to immigration checkpoints on the road from Sacramento to San Diego. Diana, their oldest daughter, is able to make the trips from Sacramento to San Diego because DACA enables her to travel without the fear of being stopped and deported. Diana hopes that her parents can soon apply for DAPA so that the family can participate in common experiences without fearing separation.

These stories provide a small glimpse into the human toll the courts below have perpetuated by blocking the important immigration programs at issue. They also illustrate the benefits DAPA and expanded DACA would provide to the nation's families and communities.

CONCLUSION

For the reasons in the petition for certiorari and the reasons given above, this Court should grant the petition.

Respectfully submitted,

JONATHAN WEISSGLASS
Counsel of Record
ERIC P. BROWN
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Tel: (415) 421-7151
jweissglass@altshulerberzon.com

Attorneys for Amici Curiae
Service Employees International Union and American Federation of Labor and Congress of Industrial Organizations
[Additional Counsel on Next Page]

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ADDITIONAL COUNSEL FOR *AMICI CURIAE*

MELISSA CROW
EMILY CREIGHTON
American Immigration Council
1331 G Street, N.W., Suite 200
Washington, D.C. 20005
Tel: (202) 507-7523

MARIELENA HINCAPIÉ
LINTON JOAQUIN
KAREN C. TUMLIN
National Immigration Law Center
3435 Wilshire Blvd., Suite 2850
Los Angeles, CA 90010
Tel: (213) 639-3900

Attorneys for all Amici Curiae *except those listed separately below*

JUDITH A. SCOTT
DEBORAH L. SMITH
Service Employees International Union
1800 Massachusetts Ave., N.W.
Washington, D.C. 20036
Tel: (202) 730-7455

Attorneys for Amicus Curiae *Service Employees International Union*

PENDA D. HAIR
FLAVIA JIMENEZ
Advancement Project
1220 L Street, N.W., Suite 850
Washington, D.C. 20005
Tel: (202) 728-9557

Attorneys for Amicus Curiae *Advancement Project*

WADE J. HENDERSON
LISA M. BORNSTEIN
The Leadership Conference on Civil and Human Rights
1629 K Street, N.W.
Washington, DC 20006
Tel: (202) 466-3311

Attorneys for Amicus Curiae *The Leadership Conference on Civil and Human Rights*

LYNN K. RHINEHART
HAROLD C. BECKER
MATTHEW J. GINSBURG
American Federation of Labor and Congress of Industrial Organizations
815 Sixteenth Street, N.W.
Washington, D.C. 20006
Tel: (202) 637-5397

Attorneys for Amicus Curiae *American Federation of Labor and Congress of Industrial Organizations*

JUAN CARTAGENA
JOSE PEREZ
LatinoJustice PRLDEF
99 Hudson Street, 14th Floor
New York, NY 10013
Tel: (212) 219-3360

Attorneys for Amicus Curiae *LatinoJustice PRLDEF*

APPENDIX: LIST OF *AMICI CURIAE*

Action NC
Advancement Project
Alabama Coalition for Immigrant Justice
Alliance San Diego
American Federation of Labor and Congress of Industrial Organizations
American Friends Service Committee
American Immigration Council
American Immigration Lawyers Association
Americans for Immigrant Justice
America's Voice Education Fund
Anti-Defamation League
Arab American Association of New York
Arab Resource and Organizing Center
Arkansas United Community Coalition
Asian & Pacific Islander American Health Forum
Asian American Legal Defense and Education Fund
Asian Americans Advancing Justice–AAJC
Asian Americans Advancing Justice–Asian Law Caucus
Asian Americans Advancing Justice–Chicago
Asian Americans Advancing Justice–Los Angeles
Asian Law Alliance
Asian Pacific American Network of Oregon
Asian Pacific Community in Action
Asian Pacific Islander Legal Outreach
Asian Services in Action, Inc.
Asociación de Liderazgo Comunitario
Association of Asian Pacific Community Health Organizations
Bill of Rights Defense Committee and Defending Dissent Foundation

Black Alliance for Just Immigration
Boat People SOS–Houston
Border Network for Human Rights
Cabrini Immigrant Services of NYC
California Immigrant Policy Center
California Immigrant Youth Justice Alliance
California Primary Care Association
California Rural Legal Assistance Foundation
Canal Alliance Inc.
Caring Across Generations
CASA
Casa San José
Catholic Legal Immigration Network, Inc.
Causa Oregon
Center for Community Change
Center for Employment Training Immigration & Citizenship Program
Center for Intercultural Organizing
Center for Popular Democracy
Center for Public Policy Priorities
Central American Resource Center–Los Angeles
Centro de los Derechos del Migrante, Inc.
Centro Legal de la Raza
Chinese Community Center Inc.
Chinese for Affirmative Action
Clinica Sierra Vista
Coalition for Humane Immigrant Rights of Los Angeles
Colorado Immigrant Rights Coalition
Colorado Media Justice Foundation
Community Health Partnership
Community Legal Services in East Palo Alto
Comunidades Unidas
Council of Mexican Federations

Define American
Disciples Home Missions
Dolores Street Community Services
East Bay Community Law Center
East Bay Sanctuary Covenant
Educators for Fair Consideration
El CENTRO de Igualdad y Derechos
El Centro Hispano
El Comite de Apoyo a los Trabajadores Agricolas
Employee Rights Center
End Domestic Abuse Wisconsin
Equal Justice Center
Equality California
Fair Immigration Reform Movement
Farmworker Justice
Filipino Advocates for Justice
First Focus
Florida Immigrant Coalition, Inc.
The Gender Health Center
Georgia Association of Latino Elected Officials
Georgia Latino Alliance for Human Rights
Grassroots Leadership
Greater Reading Immigration Project
Hawaii Coalition for Immigrant Rights
Hispanic Federation
Hispanic Health Network
Hispanic Interest Coalition of Alabama
Hispanic National Bar Association
HOLA Ohio
Human Agenda
Idaho Community Action Network
Illinois Coalition for Immigrant and Refugee Rights
Immigrant Law Center of Minnesota
Immigrant Legal Resource Center

Immigration Center for Women and Children
The Interfaith Center for Worker Justice
International Brotherhood of Teamsters
Iowa Citizens for Community Improvement
Japanese American Citizens League
Jobs With Justice
Junta for Progressive Action
Justice for Our Neighbors–Nebraska
KAN-WIN
Korean American Community Services
Korean American Resource and Cultural Center
Korean Immigrant Workers Advocates
of Southern California
Korean Resource Center
La Coalición Latinoamericana
La Raza Centro Legal
La Union Del Pueblo Entero
Lambda Legal Defense and Education Fund, Inc.
Latin American Coalition
Latino Commission on AIDS
LatinoJustice PRLDEF
Lawyers' Committee for Civil Rights of the
San Francisco Bay Area
The Leadership Conference on Civil
and Human Rights
Legal Aid Society–Employment Law Center
The Legal Aid Society of New York
Legal Aid Society of Santa Clara County
Long Island Jobs with Justice
Los Angeles Center for Law and Justice
Los Angeles LGBT Center
Los Angeles Urban League
Lowcountry Immigration Coalition
Maine People's Alliance

Maintenance Cooperation Trust Fund
Make the Road New York
Many Languages One Voice
Massachusetts Immigrant and Refugee Advocacy Coalition
Metropolitan Organizing Strategy Enabling Strength
Mi Familia Vota
Michigan Coalition for Immigrant and Refugee Rights
Michigan Immigrant Rights Center
Michigan United
Montana Organizing Project
NANAY Community Economic Development Corporation
National Alliance of Latin American and Caribbean Communities
National Asian Pacific American Bar Association
National Center for Lesbian Rights
National Council of Asian Pacific Americans
National Council of Jewish Women
National Council of La Raza
National Day Laborer Organizing Network
National Domestic Workers Alliance
National Education Association
National Employment Law Project
National Federation of Filipino American Associations
National Guestworker Alliance
National Immigrant Justice Center
National Immigration Law Center
National Justice for Our Neighbors
National Korean American Service and Education Consortium
National Latina Institute for Reproductive Health

National LGBTQ Task Force
National Partnership for New Americans
National People's Action
National Queer Asian Pacific Islander Alliance
National Tongan American Society
Nebraska Appleseed Center for Law in the Public Interest
Neighborhood Centers Inc.
NETWORK, A National Catholic Social Justice Lobby
New Hampshire Alliance for Immigrants and Refugees
New Jersey Alliance for Immigrant Justice
New Jersey Policy Perspective
New Orleans Workers' Center for Racial Justice
New Sanctuary Coalition of New York
New York Immigration Coalition
9to5, National Association of Working Women
Northern Borders Coalition
Northwest Immigrant Rights Project
OneAmerica
Organization of Chinese Americans
Pennsylvania Immigration and Citizenship Coalition
PICO National Network
Pilipino Workers Center
Pineros y Campesinos Unidos del Noroeste
Pittsburgh LCLAA
Progressive Leadership Alliance of Nevada
Promise Arizona
Promise Arizona in Action
Proyecto Azteca, Inc.
Public Counsel
Public Law Center
Puente

Red Mexicana de Líderes y Organizaciones Migrantes
Rights for All People
Sacred Heart Community Service
San Diego Immigrant Rights Consortium
The San Diego LGBT Community Center
San Francisco Immigrant Legal and Education Network
San Francisco LGBT Community Center
Santa Clara County Asian Law Alliance
Service Employees International Union
Services, Immigrant Rights, and Education Network
Sojourners
Somos Un Pueblo Unido
South Asian American Policy & Research Institute
South Asian Bar Association of North America
South Asian Helpline and Referral Agency
South Asian Network
South Carolina Appleseed Legal Justice Center
Southeast Asia Resource Action Center
Southeast Immigrant Rights Network
Southern Poverty Law Center
St. Joseph Valley Project
Sunflower Community Action
Tennessee Immigrant and Refugee Rights Coalition
Texas Organizing Project
Thai Community Development Center
UCLA Center for Labor Research and Education
U-Lead Athens–Athens Economic Justice Coalition
Unitarian Universalist Refugee and Immigrant Services and Education, Inc.
UNITE HERE
United Farm Workers Foundation
United Migrant Opportunity Service Inc.

United We Dream
Valle del Sol, Inc.
VAYLA New Orleans
Vital Immigrant Defense Advocacy and Services
Voces de la Frontera
Washington CAN
Workers Defense Project
The Workers' Rights Center, Inc.
Worksafe, Inc.